Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Jurisdictional Separations Reform and Referral to the Federal-State Joint Board	)	CC Docket No. 80-286 DA No. 00-1865

AT&T REPLY COMMENTS ON JOINT BOARD *RECOMMENDED DECISION* ON JURISDICTIONAL SEPARATIONS

Pursuant to the Commission's Public Notice, released August 15, 2000 (DA 00-1865), and Section 1.415 of the Commission's Rules, AT&T Corp. ("AT&T") submits these reply comments on the Joint Board's Recommended Decision on Separations Reform (FCC 00J-2), released July 21, 2000 ("*Recommended Decision*"), in this proceeding.[1]

INTRODUCTION AND SUMMARY

In its initial comments, AT&T demonstrated that the Commission should *reject* the Joint Board's recommendation to institute an interim "five-year freeze of all Part 36 category relationships and allocation factors for price cap carriers, and a freeze of the allocation factors for rate-of-return carriers," and none of the other commenters has demonstrated to the contrary. First, a freeze simply cannot be reconciled with the fundamental purpose of the separations process, which is to appropriately allocate changing costs over time. Second, a freeze would flatly violate cost allocation principles. Third, a freeze would harm competition. Fourth, a freeze should not be adopted because its supporters do not support a principled freeze. Finally, a freeze would not further the Joint Board's cited justifications: stability and reduced administrative burden on the regulated companies.

[1] A list of parties filing comments and the abreviations used to identify them herein can be found in Attachment A.

ARGUMENT

First, as the commenters show, the Joint Board's approach is fundamentally inappropriate. *See* Calif. at 2. The Joint Board and supporting commenters correctly observe that this is a "time of rapid market and technology changes." *Recommended Decision* ¶ 1; *see, e.g.*, GSA at 3 ("period of dramatic changes"); Qwest at 2 ("rapid changes"). But the fact that this is a time of rapid change is a compelling reason in favor of keeping the present, flexible separations process, instead of instituting a rigid freeze. *See* Calif. at 14 (citing the need for flexibility during "rapid" change). Indeed, freeze supporters like Verizon all but concede that a freeze under such circumstances would be arbitrary. *See* Verizon at 3.

Moreover, commenters confirm that the adoption of a freeze would eliminate the current momentum toward separations reform and would risk becoming the *de facto* rule, impeding true reform. *See* Calif. at 11. Although they offer rhetoric about desiring expeditious separations reform, various freeze supporters' comments confirm this practical reality. *See* Qwest at 3-5 (arguing for eventual conversion of interim freeze to a "permanent freeze"); USTA at 9 (arguing "carriers should be *entitled* to fully expect the freeze to be in operation during the five-year period") (emphasis added).[2]

In addition, the 1997 Separations NPRM emphasized the importance of reforming the separations process in a manner that achieves administrative simplicity *and* consistency with the principles of cost causation and competitive neutrality. *See Jurisdictional Separations Reform and Referral to the Federal-State Joint Board*, 12 FCC Rcd. 22120, Notice of Proposed

[2] Indeed, the freeze supporters' inconsistency in urging "dramatic" separations reform while insisting on a freeze of the same unreformed system for up to five years is almost comical. Qwest deems the Commission's existing separations rules "outdated," but seeks to freeze them for five years, and maybe permanently. Qwest at 5. BellSouth deems the separations process "antiquated" and argues it cannot "remain untouched," but urges at the same time that it should *not* be touched for five years. *See* BellSouth ¶ 2. NECA argues that traditional jurisdictional allocations factors are "useless" and result in "serious jurisdictional cost recovery distortions," but supports a freeze. NECA at 2-3 n.7.

Rulemaking ¶ 23 (1997) (emphasis added); Calif. at 15. As explained below, however, the *Recommended Decision* flatly violates principles of cost allocation and competitive neutrality.

Second, a freeze would violate accepted cost allocation principles in numerous ways. As a freeze supporter acknowledges, "[c]osts, wherever possible[,] should be attributed to their source." PaPUC at 9; *see also* Qwest at 11 (recognizing requirement of "jurisdictional symmetry" between costs and revenues). A freeze, however, would embed in the separations process existing flaws that already cause over assignment of costs to the interstate jurisdiction. *See* WorldCom at 7 (arguing "[c]ontinued inconsistency in separations practices would . . . distort separations results"); see also MCI Comments, filed Dec. 10, 1997, at 5-6; *cf.* NECA at 2-3 n.7 (arguing traditional jurisdictional allocations factors result in "serious jurisdictional cost recovery distortions"). Indeed, PaPUC's argument for a 2-year freeze rather than a five-year freeze, because it would cause less cost misallocation, implicitly concedes that a freeze – for any length of time – results in cost misallocations. *See* PaPUC at 5-6.

A freeze also would violate accepted cost allocation principles in that it would prevent the proper assignment of increasing costs to the intrastate jurisdiction, like Internet traffic, which is treated as intrastate for separations purposes. *See* Qwest at 4 ("There is no doubt that a freeze will have impacts . . . ."); *cf.* Calif. at 6, 14 (arguing freeze would prevent proper allocations of increasing costs to intrastate jurisdiction). Qwest attempts to argue that the recent increase in local usage may not be due to the Internet, *see* Qwest at 8-9, but no other commenters dispute the indisputable – that Internet usage is growing. *See* PaPUC at 9; Calif. at 4, 20 ("ISP-bound traffic is known to be growing very quickly"); NECA at 2-3 n.7 (citing "explosive growth in Internet traffic"); NECA at 7 ("There is no dispute that Internet traffic exhibits extraordinary operating characteristics, *e.g.*, exceptionally long holding times."); JSI at 3, 5 (citing "ever-

increasing amounts of Internet usage"); Vermont at 4 (deeming 9% local DEM growth from Internet usage a "conservative estimate"); TANE at 2 (referring to "widely recognized growth in Internet usage, most of which is transmitted over local exchange carrier facilities"). A freeze would only produce ever growing inaccuracy in cost allocations over time as this intrastate calling grows relative to interstate calling. *See* Calif. at 15 ("California sees a freeze as worsening rather than improving the accuracy" of cost allocations).

The Joint Board itself recognized flaws in the separations treatment of new technologies, but its recommendation would not address them. For example, as WorldCom explains, inaccurate categorization of new technologies by rate-of-return carriers would persist because, under the *Recommended Decision*, the categorization of new technologies by rate-of-return carriers is not frozen. *See* WorldCom at 6-7. Existing problems in price cap categorization for UNEs and new technologies also would be perpetuated. *See id.*

The freeze supporters are simply unconcerned with the cost misallocations that they essentially concede a freeze would cause. Indeed, USTA candidly states that a "primary objective" of the "LEC industry" has been to minimize revenue requirement shifts between jurisdictions, USTA at 7, apparently irrespective of whether such cost shifts have indeed occurred. The Commission, however, should not ignore the substantial and growing cost misallocations that would occur under a freeze.[3]

Third, a freeze would harm the development of competition, as misallocated costs result in artificially altered rates and charges. As the commenters note, while markets are not yet

[3] Similarly, Vermont's theory that the factors it seeks to have adjusted now should be set at levels expected at the mid-point of a five-year freeze necessarily acknowledges that the factors will continue to change. *See* Vermont at 5. This theory is just an attempt to have cost misallocations from certain factors during the first and second halves of a freeze balance out. Under that theory, the Commission should, before freezing, attempt to predict the appropriate level of every separations factor two and a half years from now. That is nothing more than a crude separations process, inferior to the current process.

competitive, the separations process remains an important bulwark limiting incumbents' ability to pass artificially inflated rates and charges on to captive customers. *See* Calif. at 10. Accordingly, numerous commenters recognize the need for separations until competition increases. *See id.* at 3; USTA at 4 (recognizing need for process until unregulated); GSA at 5 (arguing for process until greater competition). Some commenters incredibly contend that separations does not affect rates or charges, but more candid commenters acknowledge this economic reality, *see* GSA at 3, 8; USTA at 8; Verizon at 4 (arguing misallocations "interject non-economic separations considerations into pricing decisions for services"). *See also* Calif. at 7. The FCC itself recognized in its 1997 Separation NPRM that a freeze of jurisdictional separations factors could affect prices. *See Recommended Decision* ¶ 13 n.40.

Fourth, the Commission should reject a freeze because neither the Joint Board nor the freeze supporters seeks a principled freeze. Indeed, their attempts to tinker with factors before a freeze would go into effect, to allow adjustments of supposedly "frozen" factors during the freeze, and to leave big gaps in the scope of a freeze are all evidence of the unworkability and inappropriateness of a freeze.

As an initial matter, Verizon correctly observes that the Joint Board "undercuts its own arguments" for a freeze by recommending an "arbitrary" change in the local DEM factor. Verizon at 4. That adjustment of the local DEM factor would be "inconsistent with the purpose of a jurisdictional freeze," because "[f]ocusing on and tinkering with only one factor undermines the concept of stability." BellSouth ¶ 10; *see* Comments of U S WEST, Inc., filed Dec. 10, 1997, at 6 (arguing against "tinkering"); Qwest at 2 (same).

Moreover, numerous freeze supporters urge an immediate "freeze," but seek the subsequent liberty to adjust factors only in their favor. These arguments reveal the inability of a

freeze to promote genuine stability. "Indeed, given that a primary objective of the freeze is to introduce stability into the separations process, permitting adjustments during the freeze would be counterproductive and at odds with this fundamental goal." BellSouth ¶ 8; *see* USTA at 12 ("[i]n principle, . . . a freeze should be a total freeze"); SBC at 5 (recognizing that adjustments during a freeze should not be permitted); USTA at 9 (arguing that "there should be no adjustments during the freeze," but seeking one exception for new ROR investment). *See also Recommended Decision* ¶ 32. Qwest recognizes the inherent contradiction between a freeze and later adjustments, declaring that "once factors and categories are frozen, there should be few, if any, adjustments until the Commission dramatically reforms its separation rules." Qwest at 10. Hence, Qwest carefully states merely that it "does not object" to a DEM adjustment using the 95% default rate if the Commission later finds Internet traffic to be jurisdictionally interstate. *Id.* USTA likewise acknowledges that, "[i]n principle, . . . a freeze should be a total freeze" and the local DEM factor should not be reduced. USTA at 12. It, like Qwest, however, "accepts" the Joint Board's recommendation as a "supportable compromise." *Id.*; *see* Qwest at 10. That "acceptance" flies in the face of the criticism, by Qwest in particular, of the current separations rules as being the result of policy compromises. *See* Qwest at 2.

Other freeze supporters seeks adjustments to factors not even recommended by the Joint Board. *See* NECA at 7 n.18 (arguing for additional later adjustments based on Internet usage data); TANE at 3; JSI at 5 (arguing for later restatement of DEM factors based on jurisdictional determination); PaPUC Comments at 8 (seeking adjustment of local loop costs "during the freeze"); Vermont at 7 (urging adjustment of loop plant factor "during the freeze"). Various commenters, still more unabashed, argue vaguely that adjustments to unspecified

"frozen" factors should be allowed during the five-year freeze for exogenous changes. *See* JSI at 6-7; GVNW at 7-8 (adjustments for "significant changes in operations").

Also, freeze supporters would leave big gaps in the scope of a freeze. For example, unfrozen during the supposed freeze would be new rate-of-return carriers' categories of investment. *See* NECA at 8; GVNW at 4; USTA at 9. The Joint Board and various freeze supporters contend that these should not be frozen because fluctuation in ROR carriers' investment patterns justifies flexibility in cost recovery. *See Recommended Decision* ¶ 21; NECA at 4. Of course, neither the Joint Board nor any of its supporters has explained why these factors should be adjusted but not the many others that will predictably change as well.[4] The Joint Board and various freeze supporters also recognize that a freeze would not address transfers and mergers of exchanges. *See* NECA at 9-10; JSI at 8. Some commenters point out that, for all its effort, the Joint Board's recommendation would not address certain complexities of transfers and mergers, *see* NECA at 9, belying the purported simplicity of the freeze concept. Additionally, the *Recommended Decision* does not address carriers converting from average schedule to cost-based settlements, yet another urged gap in the scope of a freeze. *See id.* at 8; JSI at 7-8. The Commission should reject freeze supporters' urgings for this highly unprincipled freeze.

Finally, a freeze would not further the cited Joint Board justifications. The first primary justification is to provide stability for carriers by minimizing costs shifts that might occur under circumstances not contemplated by the current Part 36 rules, such as the growth of Internet usage. The second is to reduce regulatory burdens on carriers during a transition from a

[4] NECA's proposal to allow rate-of-return carriers the option to freeze or not to freeze on a per-study area basis only invites gaming of the system resulting in cost misallocations and market distortions. *See* NECA at 5.

regulated monopoly to a deregulated competitive environment in local markets. *See Recommended Decision* ¶ 15. Neither is valid.

As numerous commenters recognize, instability is not a risk because there is little *overall* cost shift between jurisdictions over time. *See* Verizon at 3; WorldCom at 4 & n.9. As Qwest observes, "[w]hile new services and technologies are being introduced on a regular basis, there is no reason to believe that these changes will or should have a dramatic impact on separations." Qwest at 3 & n.8. The Joint Board itself recognized that, even without a freeze, there would be "little fluctuation" in relative levels that impact separations. *Recommended Decision* ¶ 23; *see* Verizon at 3. As California explains, local competition has been too meager to have significant effects on separations results. *See* Calif. at 12; Qwest at 6 (stating that usage patterns associated with UNEs "are expected to remain unchanged"). If more competition were to arise, it would be unreasonable to have frozen separations factors and categories at pre-competition levels. *See* Calif. at 13. As commenters note, although Internet usage is growing, interstate usage is growing as well, as with special access. *See* PaPUC at 6 & n.11; WorldCom at 4 & n.9 (noting offsetting changes in traffic patterns increasing interstate costs).

Specifically, growing Internet usage does not cause instability in the current process because there is no cost-revenue mismatch for ISP-bound traffic. *See* WorldCom at 2-3; Verizon at 6-7. *See also* AT&T at 4 & n.4. The freeze supporters' arguments to the contrary are simply a self-serving attempt to shift as many costs as possible from intrastate to interstate. In so doing, these commenters ignore a fundamental principle of separations – that costs should be allocated to jurisdictions in a manner consistent with the corresponding revenues. *See* Qwest at 5 (arguing that costs should be matched with revenues in each jurisdiction); PaPUC at 9; WorldCom at 3. While ISP-bound traffic is interstate for jurisdictional purposes, it is not treated

as interstate for separations purposes. This is because the FCC has found that proper separations treatment of ISP-bound traffic is not determined by the jurisdictional classification of that traffic, but by the fact that ISPs obtain their connections pursuant to local business line tariffs. *See* WorldCom at 2-3. To avoid a cost-revenue mismatch, both the costs and revenues associated with these connections must be accounted for as intrastate. *See* Verizon at 6. In short, the fact that intrastate costs may be growing due to growing Internet traffic does not support a freeze; quite the opposite.

Thus, the FCC's possible reaffirmance of its determination that Internet traffic is jurisdictionally interstate would be no basis for a change in its treatment for separations purposes. The only commenters who favor a local DEM reduction and recognize that Internet usage is currently treated as intrastate for separations purposes (apart from its jurisdictional designation) are USTA and SBC. *See* USTA at 11; SBC at 6 (acknowledging distinction between jurisdictional nature of Internet traffic and treatment of Internet traffic for separation purposes). The Joint Board implicitly recognized that Internet costs have been intrastate for separations purposes by proposing a reduction of the *local* DEM.

In any event, there should not be any local DEM reduction. *See* WorldCom at 2-6; BellSouth Comments ¶ 10. "The Commission has consistently expressed doubt that ISPs create uncompensated costs for the ILECs . . . ." WorldCom at 5 (citing *Access Charge Reform*, First Report and Order, CC Docket No. 96-262, rel. May 16, 1997, at ¶ 346). The Joint Board itself concedes that the record on the level of Internet usage is inadequate to quantify an adjustment to any allocation factor, *see Recommended Decision* ¶ 29; Calif. at 20-21, and the commenters concur, *see* Qwest at 8; PaPUC at 8 ("[T]he record on the effects of Internet usage on jurisdictional separations is currently inadequate . . . ."). Qwest explicitly recognizes that to

use the Joint Board's 95% default rate would "arbitrarily adjust the DEM factor." Qwest at 10. Thus, "it would be inappropriate to attempt to attribute a specific portion of DEM to Internet usage and make a corresponding adjustment . . . ." *Id.* The record also contains necessarily inadequate data for the PaPUC's proposed local loop adjustment.

The inadequacy of the more extreme proposals for larger local DEM reductions, like Vermont's, is illustrated by Vermont's own calculations. Those calculations show that its proposed adjustment would cause the interstate DEM allocation factor to almost *triple*, from 13.1% to 35.7%. *See* Vermont, Att. I, Pt. B. With a large portion of LEC costs allocated on the basis of usage, this would result in a massive shift of costs from intrastate to interstate, while, as noted above, the corresponding revenues continue to be obtained from intrastate rates.

As explained above, numerous freeze supporters unabashedly seek to adjust additional factors, even during the freeze. One of these proposals requires specific attention here. JSI "recommends that all usage-based factors be adjusted to exclude the impact of Internet usage before being frozen." JSI at 5. Among these factors, JSI includes the weighted DEM component used to calculate local switching support and recommends that it be restated to exclude any internet usage included in the weighted local DEM factor when it was frozen using 1996 data. JSI thus recommends that the Joint Board's 95% percent default factor be utilized to reduce the local DEM for 1996, with the frozen interstate component then restated accordingly. *See id.* at 6.

JSI's recommendations should not be adopted. As explained in detail above, inclusion of Internet traffic in the local DEM factor is simply not a problem and there is no need to adjust any other factors for Internet usage. There is, however, a flaw in the current calculation of the frozen weighted DEM factor that assigns additional investment to interstate for smaller

companies. The problem with the existing formula, *see* Part 36.125(f), in which the weighted DEM factor is frozen at its 1996 level, is that it fails to allow for LECs transitioning to lower DEM weighting factors as their lines grow beyond certain thresholds. The frozen weighted DEM calculation is thus inconsistent with the remainder of Part 36.125(f), in which the weighting factor varies with the number of access lines in a study area and is reduced whenever the number of lines exceeds one of the thresholds.[5] It is also inconsistent with the calculation of local switching support specified in the Part 54 rules for Universal Service support, where it states: "If the number of a study area's access lines increases such that, under 36.125(f) of this chapter, the weighted interstate DEM factor for 1997 or any successive year would be reduced, that lower weighted interstate DEM factor shall be applied to the carrier's 1996 unweighted interstate DEM factor to derive a new local switching support factor." 47 C.F.R. § 54.301(a)(2)(ii). The frozen weighted DEM calculation specified in 36.125(f) should be corrected so as to conform to 54.301(a)(2)(ii). *See* Comments of Frontier Corporation, filed Sept. 11, 1995, at 3.[6]

Furthermore, a freeze would not significantly reduce the regulatory burden on LECs. As an initial matter, AT&T notes that this is just what the LECs argued before when the separations reform issue was referred to the Joint Board; the Commission did not accept the freeze argument then, and it should not now. *See* AT&T at 5. Moreover, a freeze would not reduce the administrative burden of the separations process because LECs already have automated their compliance. *See* Sprint Comments, filed Dec. 10, 1997, at 6. Furthermore,

[5] The DEM weighting factors depend on the number of access lines in a study area and consist of: 3.0 for 0-10,000 access lines, 2.5 for 10,001-20,000 lines, 2.0 for 20,001-50,000 lines, and 1.0 above 50,000 lines. Each year several companies become subject to a lower weighting factor because of growth in their number of lines. According to USAC data, 20 companies crossed one of the thresholds in 1999, while another 22 companies crossed a threshold in 2000.

freeze supporters urge that price cap LECs continue to compute jurisdictional allocation factors during a freeze. *See, e.g.*, GSA at 8. As GSA observes, price cap LECs, in particular, have "substantial resources, and should not be unreasonably burdened by a requirement to continue the studies and analyses in the separations process during the next few years." *Id.* at 9. Even the Joint Board still recommends that all carriers continue to report separations results. Qwest acknowledges that this requirement would "deprive" LECs of one of the primary purported benefits of a freeze. Qwest at 6-7 n.14. In addition, the FCC has no control over whether states require the studies at issue, *see Recommended Decision* ¶ 19; Qwest at 7, which Qwest also specifically acknowledges would deprive LECs of a primary benefit of a freeze. Qwest at 7-8. Notably, the LECs apparently have no objection to bearing the administrative burdens of the immediate adjustments before a freeze and adjustments to certain factors during a "freeze" that are in their favor, and adjustments in large gap areas beyond the scope of their proposed freeze.

With respect to genuine reform, only very few immediate adjustments to the separations process are required. They are with regard to the treatment of the full embedded cost of UNEs and interconnection, "hidden" plant for supporting services, and marketing and customer services expenses currently allocated under the marketing-billed revenue factor and the IXC service order processing, IXC payment and collection, and IXC billing inquiring allocation factors. *See* AT&T at 6-7; *see generally* AT&T Comments, filed Dec. 10, 1997. Significantly, numerous commenters, and even the Joint Board, recognize the urgent need to reconsider the treatment of UNEs. *See, e.g., Recommended Decision* ¶ 27; SBC at 2; GSA at 5; WorldCom at 7; USTA at 8. The Commission should focus its attention in these areas, rather than on an ill-conceived and counterproductive "freeze."

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[6] Even if the freeze were adopted, the weighted local DEM should not be frozen for the five-year freeze based on 1996 data, but based on current data. The Joint Board and commenters agree as a general matter that recent data

CONCLUSION

For the reasons stated above and in AT&T's Comments, and in AT&T's September 25, 1997 Comments, the Commission should *not* adopt an interim freeze and should undertake to reform the separations process in the limited manner discussed herein and in AT&T's December 10, 1997, and September 25, 1997, Comments.

Respectfully submitted,

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should be used. See *Recommended Decision* ¶ 29; NECA at 5-6; JSI at 6.

Attachment 1

Commenter	Abbreviation
BellSouth Corporation	BellSouth
California Public Utilites Commission	Calif.
CHR Solutions Inc.	CHR
General Services Administration	GSA
GVNW Consulting Inc.	GVNW
John Staurulakis Inc.	JSI
National Exchange Carrier Association	NECA
Pennsylvania Utilites Commission	PaPUC
Qwest Corporation	Qwest
SBC Communications, Inc.	SBC
Telephone Association of New England	TANE
United States Telephone Association	USTA
Verizon Communications	Verizon
Vermont Public Utilities Commission	Vermont
WorldCom, Inc.	WorldCom

CERTIFICATE OF SERVICE

I, James P. Young, do hereby certify that on this, the 10th day of October, 2000, copies of the foregoing "AT&T Reply Comments on Joint Board *Recommended Decision* on Jurisdictional Separations" were served by facsimile and U.S. first class mail, postage prepaid, on the parties on the attached Service List.

/s/ James P. Young
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